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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

HAWAIIAN KINGDOM

Plaintiff,  
vs.

JOSEPH ROBINETTE BIDEN JR.,  
in his official capacity as President of  
the United States; et al.,

Defendants.

CIVIL NO. 1:21:cv-243-LEK-RT

FEDERAL GOVERNMENT  
DEFENDANTS' CROSS-MOTION  
TO DISMISS THE FIRST  
AMENDED COMPLAINT

**FEDERAL GOVERNMENT DEFENDANTS' CROSS-MOTION  
TO DISMISS THE FIRST AMENDED COMPLAINT**

Defendants, the United States Of America; Joseph Robinette Biden Jr., President Of The United States; Kamala Harris, Vice-President Of The United States; Admiral John Aquilino, Commander, U.S. Indo-Pacific Command; Charles P. Rettig, Commissioner Of The Internal Revenue Service; Charles E. Schumer, U.S. Senate Majority Leader; and Nancy Pelosi, Speaker Of The United States House Of Representatives, hereby move this Court to dismiss Plaintiff's first amended complaint. ECF No. 55. This Motion is brought pursuant to Civil Rule 12, and is supported by the attached Memorandum, and the entire file herein.

This motion is made following a conference of counsel pursuant to Local Rule 7.8, which took place on December 13, 2021.

DATED: January 14, 2022

Respectfully submitted,

BRIAN M. BOYNTON  
Acting Assistant Attorney General

ANTHONY J. COPPOLINO  
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*/s/ Michael J. Gerardi*  
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CERTIFICATE OF SERVICE

I hereby certify that, on the dates noted below, a true and correct copy of the foregoing was served electronically through CM/ECF.

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*Attorney for Anders G.O. Nervell, in his official capacity as Sweden's Honorary Consul to Hawai'i*

DATED: January 14, 2021, at Washington, D.C.

/s/ Michael J. Gerardi  
MICHAEL J. GERARDI